

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

Notice of Motion

Kevin Patterson
7830 S May St
APT# 1 floor
Chicago, IL 60620

Debtor Attorney: Geraci Law L.L.C.
in Ch. 11, ECF, notice

On May 04, 2017 at 10:30 am, I will appear at the location listed to the right, and present this motion.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Thursday, April 27, 2017.

- > Dirksen Federal Building
- > 219 South Dearborn
- > Courtroom 744
- > Chicago, IL 60604

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case For Unreasonable Delay

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 11/22/2016.
 2. The debtor(s) have failed to provide to the Trustee a copy of the Federal income tax return (or transcript thereof) for the four years preceding the filing of the petition.
 3. The debtor(s) have failed to maintain payments to the Trustee's office as required under 11 U.S.C. §1326.
 4. The debtor(s) have failed to commit all disposable income to the plan.
 5. The debtor(s) have failed to amend schedule G to list landlord.
 6. Debtor has failed to amend schedule J to correctly list his expenses.
 7. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE